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Noble Resources  
Group

December 3, 2014

California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236  
Attn: Laura Peters  
Email: [Laura.Peters@water.ca.gov](mailto:Laura.Peters@water.ca.gov)

### **RE: Eligibility Documentation - for ACP "Compost Water Conservation" DWR Water-Energy grant proposal application**

The Association of Compost Producers (ACP), a 501(c)3 non-profit, educational and research organization is an "eligible applicant" as a nonprofit organization in the State of California. This written statement (and the following additional information on the associated references and websites) containing the relevant information supports ACP's eligibility for this application.

Nonprofit Organization: The following documentation, also attached under "Attachment 1" in the DWR Water-Energy grant application, shows both ACP's nonprofit status since 1995, as well as being currently active, i.e. the legal authority under which the applicant was formed and is authorized to operate as a Nonprofit in the State of California:

1. Nonprofit status since 1995 – "ACP Articles of Inc & Form CE-107"
2. Nonprofit status currently "Active" – "ACP Corporate Status 12.9.14"

Legal Authority with the State of California, Legal Agreements among partner agencies and/or organizations that ensure performance of the project and tracking of funds:  
ACP has the legal authority to enter into grant agreements with the State of California by virtue of its nonprofit status, given the "nonprofit organization" eligibility stated in the DWR Water-Energy grant PSP. As evidence that ACP has conducted grant research projects with California State agencies, see a successfully completed project that ACP performed for the San Joaquin Valley Air Pollution Control District ([www.valleyair.org](http://www.valleyair.org)). The completed report can be found on their web site at:  
[http://www.valleyair.org/Grant\\_Programs/TAP/documents/C-15636-ACP/C-15636\\_ACP\\_FinalReport.pdf](http://www.valleyair.org/Grant_Programs/TAP/documents/C-15636-ACP/C-15636_ACP_FinalReport.pdf).

We also include the contract document from this project:

- Signed Contract for this Grant Project: "C-15636\_Final\_TAP\_Contract-signed"

Other Eligibility Questions:

In addition to the Nonprofit Organization status, legal authority and legal agreements, the "2014\_WE\_GL\_PSP\_Final\_10102014" document addresses other questions regarding eligibility documentation relative to various elements of the grant application. We address each of the elements in this letter, with the understanding that in this grant application, our proposal does not require any unusual compliance management arrangements or documentation beyond existing gardening, landscaping, agricultural and natural lands practices that are already taking place at the various proposed project sites, including:

- **Urban Water Management Compliance** – No urban water suppliers will be receiving funds from this grant. While we will be conserving urban water in some of the projects, we will be doing so only with *end-user retail water users* on the following project sites:
  - Orange County Great Park Farm Site
  - EnrichLA, LAUSD School Sites
  - Chino Basin Water Conservation District Park Site
  - Kendall Jackson Winery Site

These garden sites will be sub-metered for the purpose of this grant, only. This will not affect the operations or compliance of any of these respective water agency customers. The Project Site Managers and the Project Manager will inform the various retail urban water agencies, if and when this grant is awarded, but there is no need to obtain their participation during the grant application process. The project team, at the various sites, will use this grant as an opportunity for outreach to the respective local retail water agencies. These project sites will all be demonstrating how high organic soils can be used as a best management practice (BMP) to conserve water when growing various food or landscape cultivars.

- **Ground Water Management Compliance** – In the non-irrigated sites, only currently existing rainwater runoff catchment or enhanced infiltration on the grassland sites, will be used. The Project Team has determined that there is no overly high volume changes from current practices that will affect groundwater or basin management appreciably. All of these basins will be mildly enhanced through the proposed activities of this grant, but not to the extent that basin management will be greatly affected. Specifically, on the project sites in question:
  - Elmer Paseo – this site is already being managed by the "Council for Watershed Health," ([www.watershedhealth.org](http://www.watershedhealth.org)) and the 0.11 acre bioswale BMP is already in place. This grant is for the *maintenance* of the existing constructed bioswale using compost and compost filter socks. The 6.5 af/yr run on is already being managed starting with the initial construction over two years ago. This project simply is for the cost of maintaining these existing soil ecosystem structures, so that the *site keeps performing as designed*.
  - Meadowview HOA – this large privately owned and managed meadow, by [www.meadowviewhoa.org](http://www.meadowviewhoa.org), already exists and the compost application will divert existing runoff to infiltration into the local basin through the existing meadow soil profile. Since the project plots on this project site are going to be only <3% of the total site area (10 acres of the 370 acre total site) this water will have a greater impact on protecting the local stream from erosion and water loss. The retained (conserved) water will be used (as in the rangeland project sites) to increase the GHG sequestration by the grasses, much more than adding to the local aquifer.

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- Corda Ranch and Stemple Creek Ranch – the forty acres of grassland that will be used at these two project sites, while infiltrating and conserving water, will likely not appreciably impact any local groundwater basins. Rather, the water will be used by the perennial grassland ecosystem to fix massive amounts of carbon, thus *using the conserved water to greatly enhance GHG savings* (via carbon sequestration, i.e.  $nH_2O + nCO_2 \rightarrow -CHOH_n- + O_2$ ). The extent to which this occurs is based on published results from the Project Site Management team, the Marin Carbon Project of the Carbon Cycle Institute ([www.carboncycle.org](http://www.carboncycle.org)), and included in the references in Attachment 2.
- **Agricultural Water Management Compliance** – This project does not include any agriculture water management elements in any of the proposed project sites.
- **Surface Water Diversion Compliance** - This project does not include any surface water diversion elements in any of the proposed project sites.

If the DWR Water-Energy grant team has any eligibility questions or concerns, please contact the Project Manager, Dan Noble, Executive Director, Association of Compost Producers, (619) 992-8389, [DanWylderNoble@gmail.com](mailto:DanWylderNoble@gmail.com).

Sincerely,



Daniel W. Noble

Executive Director

**Association of Compost Producers**

The Calif. State Chapter of the US Composting Council

"We Build Healthy Soil" - [www.HealthySoil.org](http://www.HealthySoil.org)

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